

**SCANNED**

SDNY

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORKIN RE JUDGMENT OF COMMERCIAL  
COURT, LONDON,  
DATED OCTOBER 23, 2006Docket # 07-CIV-4779  
Judge DanielsRelates to:  
ROBERT W. MANN, AS TRUSTEE FOR  
ROBERT W. MANN RETIREMENT TRUST,  
LOTUSBAY, LLC,  
LIAN MEI DEVELOPMENT, LLC,  
Judgment Creditors

V.

MICHAEL ROBERT ALEXANDER BROWN,  
FIFTH AVENUE PARTNERS LTD.,  
DEVONSHIRE CAPITAL LTD.,  
LAMBERHURST DEVELOPMENTS LTD.,  
FIFTH AVENUE PARTNERS GMBH  
Judgment Debtors**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

2007 Aug -8 PM 12:59

U.S. DISTRICT COURT  
FILED  
CLERK'S OFFICEreceived  
8/8/07

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Joshua Bachrach, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name:	Andrew R. Benedict, Esquire
Firm Name:	Rawle & Henderson LLP
Address:	The Widener Building
City/State/Zip:	One South Penn Square
Email Address:	Philadelphia, Pennsylvania 19107
	<a href="mailto:abenedict@rawle.com">abenedict@rawle.com</a>

Andrew R. Benedict, Esquire is a member in good standing of the Bar of the States of Pennsylvania

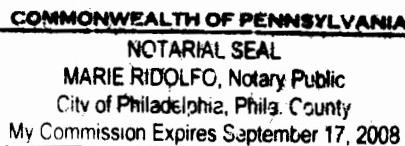
There are no pending disciplinary proceeding against Andrew R. Benedict in any State or Federal Court.

Dated: 8-3-07

City, State: Phila PA  
*Marie Ridolfo*

Respectfully submitted,

Joshua Bachrach, Esquire  
SDNY Bar #35701  
Rawle & Henderson LLP  
One S. Penn Square, 16<sup>th</sup> Floor  
The Widener Building  
Philadelphia, PA 19107  
215-575-4200  
215-563-2583



UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

IN RE JUDGMENT OF COMMERCIAL COURT, LONDON, DATED OCTOBER 23, 2006	:	Docket # 07-CIV-4779 Judge Daniels
Relates to:	:	
ROBERT W. MANN, AS TRUSTEE FOR ROBERT W. MANN RETIREMENT TRUST,	:	
LOTUSBAY, LLC,	:	
LIAN MEI DEVELOPMENT, LLC,	:	
Judgment Creditors	:	
V.	:	
MICHAEL ROBERT ALEXANDER BROWN,	:	<b>AFFIDAVIT OF JOSHUA BACHRACH</b>
FIFTH AVENUE PARTNERS LTD.,	:	<b>IN SUPPORT OF MOTION TO ADMIT</b>
DEVONSHIRE CAPITAL LTD.,	:	<b>COUNSEL PRO HAC VICE</b>
LAMBERHURST DEVELOPMENTS LTD.,	:	
FIFTH AVENUE PARTNERS GMBH	:	
Judgment Debtors	:	

State of New York         )  
                                       )  
                                       ss:  
County of New York         )

Joshua Bachrach, being duly sworn, hereby deposes and says as follows:

1. I am, Joshua Bachrach , counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Andrew R. Benedict as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am admitted to the bar of the United States District Court for the Southern District of New York since August 1999, and am in good standing with this Court.
3. I have known Andrew R. Benedict since December, 2005.
4. Andrew R. Benedict, an attorney at Rawle & Henderson LLP in Philadelphia, Pennsylvania.
5. I have found Andrew R. Benedict to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Andrew R. Benedict, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Andrew R. Benedict, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Andrew R. Benedict, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

Dated: 7-27-07

City, State:

Notarized:

Barbara Nipon

Respectfully submitted,



Joshua Bachrach  
SDNY Bar Code: JB5707

**COMMONWEALTH OF PENNSYLVANIA**

**NOTARIAL SEAL**

BARBARA NIPON, Notary Public  
City of Philadelphia, Phila. County  
My Commission Expires September 17, 2008

Sworn to and subscribed before me  
this 27 day of JULY 2007.



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

*Andrew Read Benedict, Esq.*

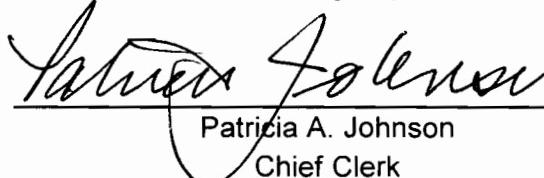
**DATE OF ADMISSION**

*November 20, 2001*

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal  
Dated: July 26, 2007

  
\_\_\_\_\_  
Patricia A. Johnson  
Chief Clerk

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

IN RE JUDGMENT OF COMMERCIAL	:	Docket # 07-CIV-4779
COURT, LONDON,	:	Judge Daniels
DATED OCTOBER 23, 2006	:	
	:	
Relates to:	:	
ROBERT W. MANN, AS TRUSTEE FOR	:	
ROBERT W. MANN RETIREMENT TRUST,	:	
LOTUSBAY, LLC,	:	
LIAN MEI DEVELOPMENT, LLC,	:	
Judgment Creditors	:	
	:	
V.	:	
	:	
MICHAEL ROBERT ALEXANDER BROWN,	:	<b>ORDER FOR ADMISSION</b>
FIFTH AVENUE PARTNERS LTD.,	:	<b>PRO HAC VICE</b>
DEVONSHIRE CAPITAL LTD.,	:	<b>ON WRITTEN MOTION</b>
LAMBERHURST DEVELOPMENTS LTD.,	:	
FIFTH AVENUE PARTNERS GMBH	:	
Judgment Debtors	:	
	:	

Upon the motion of Joshua Bachrach, attorney for Plaintiffs and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name:	Andrew R. Benedict, Esquire
Firm Name:	Rawle & Henderson LLP
Address:	The Widener Building
	One South Penn Square
City/State/Zip:	Philadelphia, Pennsylvania 19107
Email Address:	<u>abenedict@rawle.com</u>

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

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United States District/Magistrate Judge

**CERTIFICATION OF SERVICE**

I hereby certify that on today's date I served a true and correct copy of the foregoing Motion Pro Hac Vice was served upon the following by international federal express:

Michael Robert Alexander Brown  
Avenue Rotgetes 9, Esporles, Mallorca, 07190, Spain

Fifth Avenue Partners Ltd., aka 5<sup>th</sup> Avenue Partners Ltd.  
10 Dominion Street, London, EC2M 2EE, U.K.

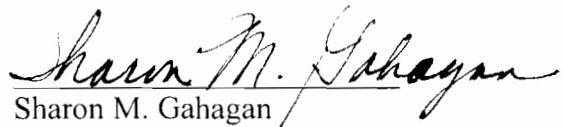
Devonshire Capital Ltd.  
10 Dominion Street, London, EC2M 2EE, U.K.

Lamberhurst Properties Ltd.  
10 Dominion Street, London, EC2M 2EE, U.K.

Fifth Avenue Partners GmbH aka 5<sup>th</sup> Avenue Partners GmbH  
Calle Conquistador 18, Planta Primero, Palma de Mallorca, 07001, Spain

**RAWLE & HENDERSON LLP**

By:

  
Sharon M. Gahagan

Dated: 8/3/07